

# **DATA EXCHANGE FRAMEWORK BOOTCAMP WORKSHEETS**

**DxF Multi-Association Education Initiative**

***Driving Health Equity with Data Exchange***

**Hosted by ITUP on November 2, 2023**



# Table of Contents

---

**1** Introduction

---

**2** DSA Readiness  
Activity

---

**3** DSA Compliance  
Activity

---

**4** DSA Technical  
Exchange Activity

---

# Introduction

## The Data Exchange Framework (DxF)

The DxF will facilitate secure and appropriate exchange of health and social service information (HSSI), giving providers a clear understanding of a patient’s full health history and the information needed to provide safe, effective, whole-person care.

The DxF is technology agnostic – Rather, it provides the “rules of the road” with a common set of policies to bring together existing standalone health systems, providers, and social services to seamlessly provider better care and improve health outcomes for all Californians.

Signing the DSA is the first step of the DxF implementation process.

## How to use the DxF Bootcamp Worksheets

These worksheets are designed to be completed during the DxF Bootcamp conducted by the DxF Multi-Association Education Initiative.

During today’s session, these questions will help you assess your readiness for DxF implementation, examine the DxF’s impact on internal operations and technical exchange requirements, and explore available technology and mechanisms to exchange information under the DxF.

The completed worksheets can be a valuable tool to present to your organization to kickstart conversations about DxF implementation.

## The DxF Multi-Association Education Initiative

To support DxF education and participation, the following organizations have come together to form the DxF Multi-Association Education Initiative:



Consulting Supports:



# DSA Readiness Activity

## Activity Objective

The following activity defines your organization in relation to:

- Your obligations under the DxF
- Your readiness to implement
- Your eligibility for DxF grant funding

## DSA Signing and Effective Date Considerations

1. Does your organization need to sign the DSA under [A.B. 133](#) (2021)?
  - Yes (see list below of required signatories)
  - No

**Required signatories include** general acute care hospitals; Acute psychiatric hospitals (100+ beds); Physician organizations (e.g., Independent Practice Associations that exchange health information) and medical groups; Skilled nursing facilities that currently maintain electronic records or electronic health information; Health care service plans and disability insurers; Clinical laboratories regulated by CDPH

2. Has your organization signed the DSA? See *the [DSA signatory list](#)*.
  - Yes
  - No

3. If you have not yet signed but are interested in doing so and/or required to do so:
  - a. Who do you need to talk to about signing the DSA?  
(E.g., HIT administrator, compliance, legal, etc.)

b. Who at your organization has signing authority?

c. Are you a subsidiary of a larger corporate entity?

- Yes
- No

d. Are you signing the DSA on behalf of any subsidiaries?

- Yes
- No

4. If you signed the DSA, what is the compliance date by which you must begin sharing and receiving information?

- January 31, 2024
- January 31, 2026

## Initial Legal and Technology Considerations

1. Is your organization – or parts of your organization – a HIPAA Covered Entity? See the [OCR Covered Entity Decision Tool](#).

- Yes – I am a health plan, health care clearinghouse, or health care provider
- No

2. Is your organization a HIPAA Business Associate of a Covered Entity? See the [OCR Business Association Guidance](#).

- Yes, for these organizations:
- No

3. Do you utilize a certified electronic health record (C-EHR) in your work? See the [ONC Health IT Certification website](#).

- Yes
- No



# DSA Compliance Activity

## Activity Objective

Review areas for internal updates to comply with the following P&Ps:

- Breach Notification
- Permitted, Required and Prohibited Purposes
- Privacy and Security Safeguards
- California Information Blocking Prohibitions

## Purposes / Privacy and Security P&P Considerations

1. Do you have internal policies and procedures related to privacy and security?
  - Yes
  - No
2. Do your internal P&Ps include the requirement to share data with other DSA participants for all treatment, payment, and operations purposes, as specified (beyond HIPAA requirements)?
  - Yes
  - No
3. Do your internal P&Ps cover HSSI – beyond just PHI or specific data types?
  - Yes
  - No
4. For non-Covered Entities/Business Associates: Do your P&Ps include methods for preventing the re-use or disclosure of PHI received under the DSA?
  - Yes
  - No

## Information Blocking P&P Considerations

1. Do your internal P&Ps contain information on information blocking?
  - Yes
  - No
  
2. Is your organization a health IT developer or actor subject to the federal information blocking rule?
  - Yes
  - No
  - a. If yes, do your P&Ps account for DSA exclusion of the fees and licensing exceptions to the federal rule?
    - Yes
    - No
  
  - b. If yes, do your P&Ps account for the DSA changes to the preventing harm exception related to “professional relationships”?
    - Yes
    - No

## Breach Notification P&P Considerations

1. Does your organization have a breach notification P&P?
  - Yes
  - No
  
2. Is your organization subject to HIPAA?
  - Yes
  - No
  - a. If yes, do your P&Ps account for DSA removal of certain exceptions to breach notification?
    - Yes
    - No
  
  - b. If yes, do your P&Ps account for the DSA exclusion of risk analyses provision?
    - Yes
    - No



3. How are you sharing (sending and receiving) different types of HSSI?

Claims:

Encounters:

CCDA:

Other:

4. With whom do you share data?

Health plan:

Hospital:

Other provider:

CBO:

Other:

5. What data would you like to be receiving, and from whom?

6. What data would you like to be sending, and to whom?

7. What mechanisms are available to receive or send such data?

# Technology Considerations for Your Community

1. What resources are available in your community today?
  - Community Information Exchange:
  - Health Information Organization:
  - QHIO:
  - 2-1-1:
  - Closed Loop Referral System:
  - ADT Network:
  - Other:
  
2. What specific issues related to these resources do you need more information on to make an informed decisions about whether to take advantage of or participate in these resources?
  - Onboarding process
  - Workflow
  - Data Governance
  - Cost
  - Availability
  - Other
  
3. What other resources not mentioned here are required for your community to meet your DSA needs?